

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION - DETROIT

**IN THE MATTER OF:**

Marsena L Tyrone

CHAPTER 13  
CASE NO. 19-41124-PJS  
JUDGE PHILLIP J SHEFFERLY

Debtor

/

**TRUSTEE'S OBJECTIONS TO CONFIRMATION OF CHAPTER 13 PLAN**

**Now Comes** the Chapter 13 Trustee, KRISPEN S. CARROLL, and files her objections pursuant to E.D. Mich. LBR 3015-3(a) and opposes confirmation of the Chapter 13 Plan where it does not comply with Bankruptcy Code provisions, 11 U.S.C. §§ 1325, 1322, other applicable provisions of Title 11 Chapter 13 and Local Bankruptcy Rules, as follows:

1. Trustee requires debtor provide copies of all 2018 W-2s/1099s, immediately, and a copy of the 2018 income tax return, when filed.
2. Trustee requires debtor to remit the 2018 income tax refund to the Trustee within 14 days of receipt.
3. Trustee requires verification of debtor's income from second job.
4. Where debtor has failed to check a box in Class 9 of the Chapter 13 Plan regarding the dividend to unsecured creditors, Trustee requires clarification in any Order Confirming Plan.
5. Trustee requests all available post-petition pay stubs in order to verify debtor's income. Trustee requires the pay stubs to be received by the Trustee immediately.
6. Trustee objects to debtor's failure to list the residential lease in the Schedules and treat in the Chapter 13 Plan.

7. Trustee objects to debtor's failure to treat Rent A Center in the Chapter 13 Plan as this creditor is listed on Schedule G.
8. Trustee questions the valuation and requests information and documents underlying the lawsuit disclosed on Schedule B including any complaint, answer and Scheduling Order. Trustee requires debtor remit all proceeds, if any, to the Chapter 13 Trustee for the benefit of debtor's creditors.
9. Trustee objects to debtor's failure to disclose 403(B) on Schedule B. Trustee requests amendment of same.

**Wherefore**, the Chapter 13 Trustee prays this Honorable Court deny confirmation of the debtor's Chapter 13 Plan.

Dated: March 13, 2019

OFFICE OF THE CHAPTER 13 TRUSTEE -DETROIT  
KRISPEN S. CARROLL, CHAPTER 13 TRUSTEE

/s/ MARIA GOTSISS  
Krispen S. Carroll (P49817)  
Maria Gotsis (P67107)  
719 Griswold Street, Ste 1100  
Detroit, MI 48226  
(313) 962-5035  
[notice@det13ksc.com](mailto:notice@det13ksc.com)

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
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**IN THE MATTER OF:**

Marsena L Tyronce

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**CERTIFICATE OF MAILING**

I hereby certify that on the date indicated below, I electronically filed TRUSTEE'S OBJECTIONS TO CONFIRMATION OF CHAPTER 13 PLAN with the Clerk of the Court using the ECF system which will send notification of such filing to the following:

BABUT LAW OFFICES PLLC  
700 TOWNER STE 1  
YPSILANTI, MI 48198-5757

and I hereby certify that I have mailed by United States Postal Service the above mentioned documents to the following non-ECF participants:

Marsena L Tyronce  
7785 Grandville Ave  
Detroit, MI 48228

March 13, 2019

/s/ Barb Ecclestone

**BARB ECCLESTONE**

For the Office of the Chapter 13 Trustee-Detroit  
719 Griswold Street, Ste 1100  
Detroit, MI 48226  
(313) 962-5035  
[notice@det13ksc.com](mailto:notice@det13ksc.com)